

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:

The Lion Electric Company, *et al.*,

Debtors in a Foreign Proceeding.¹

Chapter 15

Case No. 24-18898

Judge David D. Cleary

(Will County)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
ON JANUARY 21, 2025, AT 10:00 A.M. (PREVAILING CENTRAL TIME)**

**THIS HEARING WILL BE HELD IN PERSON AT 219 S. DEARBORN ST.,
COURTROOM 644, CHICAGO, IL 60604, OR VIA ZOOM FOR GOVERNMENT.²**

MATTER GOING FORWARD:

1. Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, (III) Recognition of Initial Order, Amended and Restated Initial Order, and SISP Order, and (IV) Related Relief (Filed 12/18/24; D.I. [3](#)).

Response Deadline: January 14, 2025, at 4:00 p.m. (CT).

¹ The Debtors in these chapter 15 proceedings, together with the last four digits of their business number or employment identification number, as applicable, are: The Lion Electric Company (6310); Lion Electric Finance Canada Inc. (8102) ("[Lion Finance Canada](#)"); Lion Electric Vehicles Finance Canada Inc. (7415) ("[Lion Vehicle Finance Canada](#)"); Lion Electric Holding USA Inc. (0699) ("[Lion Holding USA](#)"); Northern Genesis Acquisition Corp. (7939) ("[Northern Genesis](#)"); The Lion Electric Co. USA Inc. (9919) ("[Lion Electric USA](#)"); Lion Electric Manufacturing USA, Inc. (0766) ("[Lion Manufacturing USA](#)"); and Lion Electric Finance USA, Inc. (4755) ("[Lion Finance USA](#)"). The location of the Debtors' headquarters and the Debtors' foreign representative is: 921 chemin de la Rivière-du-Nord, Saint-Jérôme, Québec, Canada J7Y 5G2.

² Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person. To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode. To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode. The meeting ID for this hearing is 161 122 6457, and the passcode is Cleary644. The meeting ID and passcode can also be found on the judge's page on the court's web site.

Response(s):

- A. Informal comments from the U.S. Department of Justice, on behalf of the Environmental Protection Agency (“DOJ”);
- B. Informal comments from National Bank of Canada (“NBC”);
- C. Informal comments from BMO Bank, N.A. (“BMO”);
- D. Informal comments from counsel to Fonds Finalta Capital s.e.c. and CDPQ Revenu Fixe I Inc. (together, “Finalta”);
- E. Letter objection of Brian J. Robb (Filed 1/16/25; D.I. [43](#)); and
- F. Letter objection of Christina Eskandarian (Filed 1/17/25; D.I. [45](#)).

Related Pleadings:

- A. Declaration of Richard Coulombe in Support of the Debtors' Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, (III) Recognition of Initial Order, Amended and Restated Initial Order, and SISP Order, and (IV) Related Relief (Filed 12/18/24; D.I. [4](#));
- B. Declaration of Guy Martel in Support of Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, (III) Recognition of Initial Order, Amended and Restated Initial Order, and SISP Order, and (IV) Related Relief (Filed 12/18/24; D.I. [5](#));
- C. Order Granting Provisional Relief Pursuant to Section 1519 of the Bankruptcy Code (Entered 12/20/24; D.I. [27](#));
- D. Order (A) Scheduling Hearing on Recognition of Chapter 15 Hearing and (B) Specifying Form and Manner of Service of Notice (Entered 12/20/24; D.I. [28](#));
- E. Revised Notice of (A) Filing Chapter 15 Petitions and Related Documents Seeking Recognition of Canadian Proceeding as Foreign Main Proceeding and (B) Recognition Hearing (Filed 12/24/24; D.I. [32](#));
- F. Notice of Filing of Revised Proposed Order (I) Recognizing Foreign Main Proceeding, (II) Recognizing Foreign Representative, (III) Recognizing Initial Order, Amended and Restated Initial Order, and SISP Order, and (IV) Granting Related Relief (Filed 1/17/25; D.I. [46](#)); and
- G. Revised Proposed Order (I) Recognizing Foreign Main Proceeding, (II) Recognizing Foreign Representative, (III) Recognizing Initial Order, Amended and Restated Initial Order, and SISP Order, and (IV) Granting Related Relief (Filed 1/17/25; D.I. [47](#)).

Status: The Foreign Representative has resolved the informal comments from the DOJ, NBC, BMO and Finalta through revisions to the proposed order. The letter objections of Brian J. Robb and Christina Eskandarian remain outstanding. This matter is going forward.

Dated: January 17, 2025
Chicago, Illinois

Respectfully Submitted,

TROUTMAN PEPPER LOCKE LLP

/s/ Jonathan E. Aberman

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-and-

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Counsel to the Foreign Representative

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2025, I caused the foregoing to be served upon the parties on the attached service lists, in the manner indicated. All ECF participants registered in these cases were served electronically on the date of filing through the Court's ECF system at their respective email addresses registered with the Court.

/s/ Jonathan E. Aberman

Jonathan E. Aberman (#6255541)

<u>Category</u>	<u>Counterparty Name and Address</u>	<u>Email</u>	<u>Method of Service</u>
Debtors	The Lion Electric Company, et. al. Attn: Dominique Perron 921 chemin de la Rivière-du-Nord Saint-Jérôme, Québec Canada J7Y 5G2	Dominique.Perron@thelionelectric.com	Email & Overnight Delivery
Debtors	Stikeman Elliott S.E.N.C.R.L., S.R.L. Attn: Guy Martel, Danny Duy Vu, Nathalie Nouvet, and Darien Bahry 1155 René-Lévesque W. Suite 4100 Montreal (Quebec) H3B 3V2	gmartel@stikeman.com ddvu@stikeman.com nnouvet@stikeman.com dbahry@stikeman.com	Email & Overnight Delivery
Persons Authorized to Administer Foreign Proceeding	Deloitte Restructuring Inc. Attn: Jean-Francois Boucher 8 Adelaide St. West, Suite 200 Toronto, ON M5H 0A9	jeaboucher@deloitte.ca	Email & Overnight Delivery
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<u>Category</u>	<u>Counterparty Name and Address</u>	<u>Email</u>	<u>Method of Service</u>
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U.S. Counsel to Pending Litigation	LAUREL EMPLOYMENT LAW APC Attn: Joshua I. White, Marta Manus, and Rolando Castellanos 6309 Van Nuys Boulevard, Suite 111 Van Nuys, CA 91401	josh@laurelemploymentlaw.com marta@laurelemploymentlaw.com rolando@laurelemploymentlaw.com	Email & Overnight Delivery
Secured Creditors	NATIONAL BANK OF CANADA (as Administrative Agent) Attn: Officer, Managing or General Agent 1155 Metcalfe Street, 23rd Floor Montreal, Quebec Canada H3B 4S9		Overnight Delivery
Secured Creditors	FÉDÉRATION DES CAISSES DESJARDINS DU QUÉBEC Attn: Officer, Managing or General Agent 1170 rue Peel Montreal, Quebec Canada H3B 0A9		Overnight Delivery

<u>Category</u>	<u>Counterparty Name and Address</u>	<u>Email</u>	<u>Method of Service</u>
Secured Creditors	BANK OF MONTREAL Attn: Officer, Managing or General Agent 105 RUE ST-JACQUES, 3RD FLOOR Montreal, Quebec Canada H2Y 1L6		Overnight Delivery
Secured Creditors	Bank of Montreal Attn: Officer, managing or general agent 790 North Water Street, Floor 14W Milwaukee, WI, 53202		Overnight Delivery
Secured Creditors	INVESTISSEMENT QUEBEC Attn: Officer, Managing or General Agent 1195 AVENUE LAVIGERIE SUITE 60 Quebec, Quebec Canada G1V 4N3		Overnight Delivery
Secured Creditors	FINALTA CAPITAL INC. (as Administrative Agent) Attn: Officer, Managing or General Agent 1002 SHERBROOKE WEST, SUITE 1550 Montreal, Quebec Canada H3A 3L6		Overnight Delivery
Secured Creditors	CDPQ REVENU FIXE I INC. Attn: Officer, Managing or General Agent 1000, Plane Jean-Paul Ripoeille Montreal, Quebec Canada H2Z 2B3		Overnight Delivery
Secured Creditors	FONDATION MIRELLA & LINO SAPUTO Attn: Officer, Managing or General Agent 8000 BOUL LANGELEIR SUITE 200 St. Leonard, Quebec Canada H1P 3K2		Overnight Delivery
Secured Creditors	MACH HOLDINGS INC. Attn: Officer, Managing or General Agent 630 RUE SAINT PAUL OUEST Montreal, Quebec Canada H3C 1L9		Overnight Delivery
Secured Creditors	Groupe Mach Inc. Attn: Officer, managing or general agent 630 Saint-Paul Street West Suite 600 Montreal, QC CA H3C1L9		Overnight Delivery
Secured Creditors	VISION SH INVESTMENT L.L.C. Attn: Officer, Managing or General Agent 2515 rue Faris Al Malaz, 12836-7089 Royaume d'Arabie Saoudite		Overnight Delivery

<u>Category</u>	<u>Counterparty Name and Address</u>	<u>Email</u>	<u>Method of Service</u>
Secured Creditors	9274-8375 QUÉBEC INC. Attn: Officer, Managing or General Agent 331 avenue Stanstead Mont-Royal, Quebec Canada H3R 1X5		Overnight Delivery
U.S. Trustee	Office of the U.S. Trustee Everett McKinley Dirksen Federal Building 219 S. Dearborn Street, Room 873 Chicago, IL 60604	USTP.Region11@usdoj.gov	Email & Overnight Delivery
Contract Counterparty	BMO Harris Equipment Finance Company Attn: Officer, managing or general agent 770 N. Water Street, 8th Floor Milwaukee, WI 53202		Overnight Delivery
Contract Counterparty	BMO Harris Bank N.A. Attn: Officer, managing or general agent 2915 Ogletown Rd. Newark, DE 19713-1927		Overnight Delivery
Contract Counterparty	Toyota Industries Commerical Finance, Inc. Attn: Officer, managing or general agent P.O. Box 9050 Dallas, TX 75019-9050		Overnight Delivery
Contract Counterparty	Toyota Industries Commercial Finance, Inc. Attn: Officer, managing or general agent P.O. BOX 660926 Dallas, TX 75266-0926	ticf_admin_sm@toyotacf.com	Email & Overnight Delivery
Contract Counterparty	ENGs Commerical Finance Co. Attn: Officer, managing or general agent P.O. Box 128 Itasca, IL 60143-0128		Overnight Delivery
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TN Dept. of Revenue	TN Dept of Revenue c/o TN Attorney General's Office, Bankruptcy Division Attn: Stuart Wilson-Patton PO Box 20207 Nashville, Tennessee 37202-0207	stuart.wilson-patton@ag.tn.gov	Email & Overnight Delivery

<u>Category</u>	<u>Counterparty Name and Address</u>	<u>Email</u>	<u>Method of Service</u>
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